



570 Broad Street / Suite 1201 / Newark, NJ 07102  
973.623.3000 Main / 973.623.0858 Fax / litedepalma.com

Newark / Philadelphia

August 12, 2021

**VIA ECF**

Hon. Tonianne J. Bongiovanni, U.S.M.J.  
United States District Court  
District of New Jersey  
Clarkson S. Fisher Building & U.S. Courthouse  
402 East State Street, Courtroom 6E  
Trenton, New Jersey 08608

**Re: *Gibson v. Valvano, et al.***  
**Docket No. 3:21-cv-03150 (MAS)(TJB)**

Dear Judge Bongiovanni:

This firm represents Defendant St. Paul in the above-referenced matter. We have reviewed the docket and see that a Motion to Stay was filed by codefendant Anthony Valvano. We write to join in the request previously made by Defendants Keller, Rioto, Torres, Perez, and Cascarelli that the time to respond to Plaintiff's Complaint be extended until after a decision is entered on the motion to stay. We write to join in Mr. DeFiglio and Ms. Attwood's requests, for the same reasons expressed in their previous letters to the Court. (ECF #23 & #25). The Court granted their requests. The current deadline for Defendant St. Paul to answer the Second Amended Complaint is August 23, 2021. If acceptable to the Court, we respectfully request that an Order be entered extending Defendant's time to respond to Plaintiff's Second Amended Complaint within 14 days of the Court's ruling on the pending motion.



Hon. Tonianne J. Bongiovanni, U.S.M.J.  
August 12, 2021  
Page 2

If the aforementioned meets with Your Honor's approval, Defendant St. Paul respectfully requests that Your Honor So Order this letter. Should Your Honor have any questions or require any additional submissions, please do not hesitate to have your chambers communicate with me.

Respectfully submitted,

*/s/ Victor A. Afanador*

Victor A. Afanador

VAA:emp

So Ordered:

---

HON. TONIANNE J. BONGIOVANNI, U.S.M.J.